

The substantive requirements governing Temporary Units (TUs) found at 40 CFR §264.553 are ARAR to tanks and containers used for storage and treatment of hazardous remediation wastes. Remediation waste from the CERCLA Wastewater Treatment Facility and the OU7 Passive Seep Intercept Treatment System will be managed in a Remediation Waste Storage Unit that attains the TU ARARs. Specifically, incompatible wastes, if encountered, will be segregated within the units. Secondary containment will be provided, where practical, when liquid wastes are stored or treated in tanks or containers. Waste characterization will be provided. Surveillance, at a minimum of once a week, will be provided during operations. Training for individuals generating and handling the remediation waste will be implemented in accordance with RMRS Environmental Restoration Program requirements. To close the remediation waste storage unit, all remediation waste will be removed and other remediation will be taken, as appropriate, if releases from the unit have been documented.

For B891 and OU7, the Remediation Waste Storage Unit will be located in Cargo 55 in the contractors' yard, and will primarily be used for managing filter socks from the two water treatment processes. Typically, the Remediation Waste Storage Unit will not be used for long-term storage but instead will be used to collect sufficient filter socks to fill a 55-gallon drum. Once the 55 gallon drum is filled it will be transferred into a permitted RCRA storage unit for storage prior to disposition.

When transferred to RCRA storage, the waste is still remediation waste and is only subject to the substantive RCRA storage requirements. By transferring the waste to a RCRA storage unit, RMRS ER ensures attainment of the substantive requirements and, although not required, also satisfies the administrative requirements. The other benefit of managing this remediation waste in the RCRA permitted storage system is that the RCRA hazardous waste codes will be tracked and the development of paperwork for offsite disposal will begin. The RCRA hazardous waste codes and associated land disposal restrictions become fully applicable (substantively and administratively) if the remediation waste is shipped offsite.

ADMIN RECCRD

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